

ASH GROVE CEMENT COMPANY

11011 CODY STREET
OVERLAND PARK, KANSAS 66210
PHONE 913 / 451-8900 FAX 913 / 451-8324

EILEEN FLINK
VICE PRESIDENT AND
GENERAL COUNSEL

DIRECT LINE 913 / 319-6005
E-MAIL eileen.flink@ashgrove.com

October 24, 2008

Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup
Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

Re: Ash Grove Cement Company Response to First Request for Information,
CERCLA Section 104(e)
Addresses: 13939 N. Rivergate Blvd., Portland, OR 97203
3737 N. Port Center Way, Portland, OR 97217

Dear Ms. Koch:

Ash Grove Cement Company ("Ash Grove") received EPA's First Request for Information ("RFI") regarding the Portland Harbor Superfund Site on January 21, 2008. Thank you for your consideration of our two extension requests.

Delivered with this letter are three disks. The first contains the narrative answers to questions 1-82 in the information request. The second contains documents requested in the RFI. The final disk contains both confidential business records which Ash Grove wishes to remain confidential, and a privilege log for certain materials that have not been provided.

Ash Grove submitted a partial response to the RFI together with an extension request on May 16, 2008. In the course of preparing this comprehensive set of responses, Ash Grove updated the information provided in May. Please substitute this comprehensive response for the earlier partial response.

In providing these answers to the RFI, Ash Grove does not intend to, and specifically does not admit that any of the events described constitute leaks, spills or releases into the environment, or that the materials described were hazardous substances, pollutants or contaminants. Moreover, Ash Grove specifically does not waive any defenses it may have to any liability asserted against

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the company involving the events or facts described in these responses. Please note the additional objections that are included in the responses to the RFI.

Finally, unless otherwise specified in a particular response, the answers provided are complete through May 16, 2008. Ash Grove recognizes its obligation to supplement these answers and will do so as appropriate.

If you have questions, please contact me or our outside counsel, Leslie Neller-moe at Davis Wright Tremaine. Her phone number is (206) 757-8268; her address is 1201 Third Avenue, Suite 2200, Seattle, WA 98104; her email address is leslienellermoe@dwt.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leslie Neller-moe".

ASH GROVE CEMENT COMPANY

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EILEEN FLINK
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GENERAL COUNSEL

May 16, 2008

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MAY 19 2008

Environmental
Cleanup Office

Via Federal Express

Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
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**Re: Ash Grove Cement Company Response to First Request for Information, CERCLA
Section 104(e)**

**Addresses: 13939 N. Rivergate Blvd., Portland, OR 97203
3737 N. Port Center Way, Portland, OR 97217**

Dear Ms. Koch:

Ash Grove Cement Company ("Ash Grove") received EPA's First Request for Information ("RFI") regarding the Portland Harbor Superfund Site on January 21, 2008. Ash Grove has, by separate letter to Ms. Deb Yamamoto, requested an extension of the deadline for submittal of some responses to those requests.

Enclosed with this letter is a partial response to the RFI. It begins with objections to the questions posed and outlines the assumptions used in responding to questions numbered 1, 2, 3, 4, 9, 13 a-g, 28, 29, 30, 32, 44, 45, 46, 54, 55, 56, 57 and 73. Appendices including certain drawings are included on the enclosed CD.

Please direct any questions you may have about this partial response to Ash Grove outside counsel Leslie Nellermeoe.

Very truly yours,



Eileen Flink
Vice President and General Counsel

Kristine Koch - Page 2

May 16, 2008

Enclosures

cc: Gary Church, Ash Grove
Curtis Lesslie, Ash Grove
Leslie Nellermoe, HellerEhrman